

Telford & Wrekin Council comments on Edgmond Neighbourhood Plan (Regulation 15/16 version)

Section/ Policy Area	Page/ Policy Ref	TWC Reg 14 recommended Suggestion	TWC Reg 14 Comments	Edgmond Neighbourhood Plan Response	Any additional comments following the Reg 15 version
Introduction		Amend text for consistency purposes.	In several parts of the NP text “Telford & Wrekin” is written as “Telford and Wrekin”	Amend where necessary	
	P8 3rd paragraph	Amend wording to read ...”Telford & Wrekin Council’s Cabinet ”	The designation of the neighbourhood area did not go through the Cabinet process as stated in the paragraph. It was signed off under delegated officer authority.	Amend sentence as suggested: “...Telford and Wrekin Council ’s- Cabinet- resolved in September 2016.....”	
Process of preparing the Plan	P9	Amend accordingly to allow consistency to the Local Plan.	The NP states that the “Draft Plan may need to be amended so that it complies with the probable modifications to the Local Plan”. The Council, in response to the Inspector’s questions after the Examination hearing, has produced a schedule of modifications to Local Plan. The parish Council may need to refer to the document.	The draft Neighbourhood Plan will be checked against the Inspector’s modifications when available.	
National and Local Planning Policy Framework	P10	Amend text to read “...Wrekin Local Plan is now time expired...”	The third paragraph states that the Wrekin Local Plan is now out of date.	Amend text to read: “The previous Wrekin Local Plan (1995- 2006) is now time expired.....”	
Policies	Policy RES1	More justification is required	The definition of infill sites was discussed at the recent Local Plan EiP and the Inspector will provide comments on it in his report. It may be helpful to the NP examiner for the	The community considers that the range of likely infill sites in Edgmond village are only suitable for housing developments of not more than	Policy RES1 continues to seek to apply an absolute limit on the number of homes proposed on individual housing schemes within

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			parish to articulate a justification for the NP's definition of infill sites.	3 dwellings. Proposals for more than 3 dwellings on likely infill sites are considered out of scale and character.	Edgmond. This is considered to be more restrictive than the Telford and Wrekin Local Plan Policy HO10, which supports a limited amount of infill housing in Edgmond that can demonstrate that they will help to meet the rural housing requirement. No justification is presented to support a scheme-by-scheme limit of 3 units as being a suitable definition of 'infill' development in Edgmond.
	Policy RES2	Revise policy	<p>The policy reads like a blanket policy restricting development in the countryside with exceptions only made to affordable housing schemes. Telford & Wrekin Local Plan SP3 supports development in the rural areas where it addresses the needs of the rural communities.</p> <p>Policy uses the word "preserve" the built form. The word preserve is normally associated with historic assets. Does the Plan satisfactorily provide an explanation of the type of built form to be protected?</p>	Disagree the policy refers to housing development only and has been amended to refer to 'open market' housing. Amend policy title to clarify that refers only to housing development: "POLICY RES2: NEW HOUSING DEVELOPMENT OUTSIDE OF EDMOND VILLAGE"	

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	Policy RES3	Revise policy	<p>The policy provides criteria against which proposals are to be tested if they pass policies RES1 and RES2. It is suggested that instead of using “permitted”, the policy should state that “where development is in line with the principles in policies RES1 and RES2...”</p> <p>Last bullet point refers to minimum standards. Appendix F of the Telford & Wrekin Local Plan sets parking standards. These are not minimum parking standards.</p>	<p>Agreed. Amend policy as suggested: “Where residential development is permitted in line with <i>the principles in</i> policies RES1 and RES2.....”</p> <p>Agreed. Amend policy as follows: “Proposals that exceed the minimum parking standards in Appendix F of the Local Plan will be supported.”</p>	TWC comments has been taken on board satisfactorily.
	Policy RES4	Revise policy	<p>Whilst the policy provides guidance on preserving and enhancing the Conservation Area (CA), it is silent on how harm to the CA will be assessed.</p> <p>The policy would be improved if it set out how any harm to the designated heritage asset (the CA) must be justified in line with guidance in the NPPF (para132, 133, 134...).</p>	Disagree. The proposed amendment is not required. The policy seeks to take a positive approach to any development in the Conservation Area. It is clear that development which does not meet the NP policy criteria will be harmful to the historic character of Edgmond and will not be supported.	
	Policy RES5				
	Policy G1	Revise policy to insert missing part of the sentence	Last sentence in the policy seems to be partly missing.	Agreed. Drafting error. Sentence should read: “Proposals for built development other than	

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			<p>The policy gives exemptions to appropriate community uses. Paragraph 76 of the NPPF rules out development on Local Green Space other than in very special circumstances. Paragraph 78 goes further in stating that policy for Local Green Space should be consistent with policy in green belts.</p> <p>Table 1 provides information on proposed sites. Is that enough justification to allocate the sites as local green spaces?</p>	<p>appropriate community uses on these Local Green <i>Spaces will not be supported.</i>"</p> <p>The wording is deliberate following experience elsewhere to allow for example additional recreation facilities, equipment storage or clubhouse/changing facilities.</p> <p>Yes. Evidence matches that provided for approved Neighbourhood Plans elsewhere.</p>	
	P20	Amend text	Second paragraph mentions "areas space". Do you want to mean "open spaces"?	Agreed. Amend as follows ".....protecting these areas space to contribute to....."	
	Policy G2				
	Policy G3				
	Policy E1	Revise policy	<p>Revise the phrase "Development proposals to..." to read "Development proposals that..."</p> <p>The NP could be improved if it were to encourage provision of small "well</p>	<p>Agreed. Amend as suggested: "Development proposals to <i>that</i> provide suitable,....."</p> <p>Agreed. Amend 2nd bullet as suggested: "Provision of small</p>	The Reg 15 version of the ENDP has introduced additional wording into the policy that seeks to restrict the re-use of land or buildings on existing

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			<p>designed" buildings consistent with paragraph 28 of the NPPF. Theoretically, any new building will have an impact on character of the village.</p>	<p><i>well-designed</i> new buildings or conversion of ..."</p>	<p>employment sites for residential without demonstrating that the existing use is no longer viable or that the proposal would provide demonstrable employment benefits. The tone of the modification runs counter to the direction of the policy, which is positively written and supportive of employment development subject to certain criteria. The modification also runs counter to Policy HO10 of the Telford & Wrekin Local Plan, which supports conversion of employment uses to residential within named settlements such as Edgmond.</p>
	Policy E2				
	Policy E3				
	Policy C1	Amend policy or appendix 3 to clearly signpost users to the	The policy offers protection to existing community facilities listed in the Parish Profile (Appendix 3). Appendix 3	Agreed. Amend Appendix 3 to clarify that referring to community facilities listed	

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		community facilities referred to in the policy.	contains information about the parish including community services under "Access to Services and Public Transport. Does the Policy C1 mean these community services? Should the title of the policy be reworded?	rather than other services such as public transport. "Access to Facilities, Services and Public Transport Most community <i>facilities and</i> services are centered within the village of Edgmond. These include the following <i>community facilities:</i> "	
	Policy C2				